

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Christine P. O'Hearn
v. :
DECLAN GOLDEN : Crim. No. 25-349
: 18 U.S.C. § 2252(a)(3)(B)(ii)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Between on or about October 28, 2020, and on or about January 27, 2023, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

DECLAN GOLDEN,

did knowingly promote and solicit using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, any material and purported material in a manner that reflected the belief, and that was intended to cause another to believe, that the material and purported material was, and contained, a visual depiction of an actual minor engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252A(a)(3)(B)(ii).

FORFEITURE ALLEGATION

1. The United States hereby gives notice that upon the conviction of the defendant,

DECLAN GOLDEN,

of the offense in violation of Title 18, United States Code, Section 2252A(a)(3)(B)(ii) charged in this Information, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 2253, of all right, title and interest of the defendant in the following:

- a) any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in this Information, and all property traceable to such property; and
- c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

2. The property to be forfeited includes, but is not limited to, all right, title, and interest of the defendant in the following assets, which were seized by law enforcement on or about January 26, 2023:

- a. One Dell Inspiron laptop Model 15 3511 Reg. Model # P112F S/T; and

b. One terabyte external hard drive Seagate HDD Model ST10000LM035.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18 United States Code, Section 2253, to seek forfeiture of any other property of said defendant up to the value of the foreseeable property described above.



ALINA HABBA
United States Attorney

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INFORMATION FOR

18 U.S.C. § 2252A(a)(3)(B)(ii)

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